

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE: WORLD TRADE CENTER LOWER

MANHATTAN DISASTER SITE LITIGATION

-----X
RODRIGO JIMBO (AND WIFE, DOLORES CALLE),

Plaintiffs,

21 MC 102 (AKH)
Docket No. 07-CV-
1632(AKH)

**NOTICE OF CENTRAL
PARKING PARTIES
ADOPTION OF
ANSWER TO MASTER
COMPLAINT**

- against -

EDISON PARKING MANAGEMENT, L.P.,
ALLRIGHT PARKING MANAGEMENT, INC., and
CENTRAL PARKING SYSTEM OF NEW YORK,
INC., et al.

Defendants.

-----X

Defendants, EDISON PARKING MANAGEMENT, L. P., ALLRIGHT PARKING
MANAGEMENT, INC., and CENTRAL PARKING SYSTEM OF NEW YORK, INC.
("CENTRAL PARKING PARTIES"), by their attorneys LAW OFFICES OF MICHAEL
E. PRESSMAN, as and for their Response to the allegations set forth in the
Complaint by Adoption (Check-Off Complaint) related to the Master Complaint
filed in the above-referenced action hereby adopt the Central Parking Parties'
Answer to Master Complaint dated July 31, 2007, which was filed in the matter
of *IN RE WORLD TRADE CENTER LOWER MANHATTAN DISASTER LITIGATION*,
21 MC 102 (AKH).

To the extent that defendants' Answer to the Master Complaint does not
comprehensively address any of the specific allegations in the check-off
Complaint in the above captioned matter, defendants deny knowledge or

information sufficient to form a belief as to the truth of such specific allegations.

Defendants reserve the right to interpose cross claims and third party claims.

Defendants also adopt all affirmative defenses.

WHEREFORE, the CENTRAL PARKING PARTIES demand judgment dismissing the above captioned action as against each of them, together with their costs and disbursements.

Dated: New York, New York
December 18, 2007

LAW OFFICES OF
MICHAEL E. PRESSMAN

BY:

Michael E. Pressman (MEP-1440)
125 Maiden Lane - 17th Floor
New York, New York 10038
(212) 480-3030
Attorneys for Defendants
Edison Parking Management, L. P.,
Allright Parking Management, Inc.,
And Central Parking System of
New York, Inc.
File No. CPS 12688
457751/sm

TO:: See Attached Rider

RIDER

TO:

Denise A. Rubin, Esq.
Worby Groner Edelman & Napoli Bern, LLP
115 Broadway - 12th Floor
New York, New York 10006

Robert Grochow, Esq.
Robert A. Grochow, P. C.
233 Broadway - 5th Floor
New York, New York 10279

Gregory J. Cannata, Esq.
Law Firm of Gregory J. Cannata
233 Broadway - 5th Floor
New York, New York 10279

Richard Williamson, Esq.
M. Bradford Stein, Esq
Flemming Zulack Williamson Zauderer LLP
One Liberty Plaza, 35th Floor
New York, NY 10006
(212) 412-9500 (phone)
(212) 964-9200 (fax)

Frank A. Scanga, Esq.
Law Office of Frank A Scanga
477 Madison Avenue, 21st Floor
New York, NY 10022
(212) 758.4040 (phone)
(212) 308.1347 (fax)

Howard F. Strongin, Esq.
Strongin Rothman & Abrams, LLP
50 Broadway, Suite 2003
New York, NY 10004
(212) 931-8300 (phone)
(212) 931-8319 (fax)

TO:

Joseph E. Hopkins, Esq.
James E. Tyrrell, Jr., Esq.
Jonathan Peck, Esq.
Patton Boggs LLP
One Riverfront Plaza, 6th Floor
Newark, NJ 07102-5401
(973) 848-5680 (phone)
(973) 848-5601 (fax)

Richard Leff, Esq.
Kenneth Ross, Esq.
McGivney & Kluger, P.C.
80 Broad Street, 23rd Floor
New York, NY 10004
(212) 509-3456 (phone)
(212) 509-4420 (fax)

Judith R. Cohen, Esq.
Kenneth H. Frenchman, Esq.
Dickstein Shapiro LLP
1177 Avenue of the Americas
New York, NY 10036
(212) 277-6565 (phone - Cohen)
(212) 277-6670 (phone - Frenchman)
(212) 277-6501 (fax)

Gail L. Ritzert, Esq.
Havkins, Rosenfeld, Ritzert & Varriale LLP
Eleven Penn Plaza, 21st Floor
New York, NY 10001
(212) 488- 1598 (phone)
(212) 564-0203 (fax)

Larry Lum, Esq.
Christine Bernstock, Esq.
Wilson, Elser, Moskowitz, Edelman & Dicker
150 East 42nd Street
New York, NY 10017
(212) 490-3000 (phone)
(212) 490-3038 (fax)

TO:

Martin Bree, Esq.
Jill Braverman, Esq.
New York City Economic Development Corporation
Legal Affairs
110 William Street, 6th Floor
New York, NY 10038
(212) 312-3600 (phone)
(212) 312-3912 (fax)

Gary Shaffer, Esq.
New York City Law Department
Office of the Corporation Counsel
100 Church Street
New York, NY 10007
(212) 676-2740 (phone)
(212) 788-0367 (fax)

Alexis Leist, Esq.
Wade Clark & Mulcahy
111 Broadway
New York, NY 10006
(212) 267-1900 (phone)
(212) 267-9470 (fax)

William J. Smith, Esq.
Faust Goetz Schenker & Blee, LLP
Two Rector Street, 20th Floor
New York, NY 10006
(212) 363-6900 (phone)
(212) 363-1090 (fax)

Virginia Futterman, Esq.
Gillian H. Kost, Esq.
London Fischer LLP
59 Maiden Lane, 41st Floor
New York, New York 10038
(212) 972-1000 (phone)
(212) 972-1030 (fax)

TO:

John E. Sparling, Esq.
London Fischer LLP
59 Maiden Lane, 41st Floor
New York, New York 10038
(212) 972-1000 (phone)
(212) 972-1030 (fax)

Frank T. Santoro, Esq.
Glenn Fuerth, Esq.
Wilson, Elser, Moskowitz, Edelman & Dicker
150 East 42nd Street
New York, NY 10017
(212) 490-3000 (phone)
(212) 490-3038 (fax)

Benjamin E. Haglund, Esq.

Marc Crowley, Esq.

PITNEY HARDIN LLP

U.S. Mail:

P.O. Box 1945
Morristown, NJ 07962-1945

Delivery:

200 Campus Drive
Florham Park, NJ 07932
(973) 966-8227 (phone)
(973) 966-1015 (fax)

Donna-Marie Baloy, Esq.

John Flannery, Esq.

Wilson, Elser, Moskowitz, Edelman & Dicker, LLP
3 Gannett Drive
White Plains, New York 10604
(914) 323-7000 (phone)
(914) 323-7001 (fax)

Steven J. Rice, Esq.

Brian Bender, Esq.

Stanley Goos, Esq.

Harris Beach PLLC
805 Third Avenue
New York, NY 10022
(212) 687-0100 (phone)
(212) 687-0659 (fax)

TO:

Andrew B. Small, Esq.
Harrington, Ocko & Monk, LLP
81 Main Street, Suite 215
White Plains, NY 10601
(914) 686-4800 (phone)
(914) 686-4824 (fax)

Suzanne Halbardier, Esq.
Barry, McTiernan & Moore
2 Rector Street, 14th Floor
New York, NY 10006
(212) 608-8999 (phone)
(212) 608-8902 (fax)

William Joyce, Esq.
Barry, McTiernan & Moore
2 Rector Street
New York, NY 10006
(212) 608-8999 (phone)
(212) 313-3600 (fax)

James Hosking, Esq.
Dayna Cooper, Esq.
Clifford Chance US LLP
31 West 52nd Street
New York, NY 10019
(212) 878-8091 (phone)
(212) 878-8375 (fax)

Eric Foster Leon, Esq.
Andrew Dunlap, Esq.
Lee Ann Stevenson
Kirkland & Ellis LLP (NYC)
153 East 53rd Street
New York, NY 10022
(212)-446-4731 (phone)
(212)-446-4900 (fax)

TO:

Roman E. Gitnik, Esq.
Lifflander & Reich, LLP
1221 Avenue of The Americas
New York, NY 10020
(212)-332-8824 (phone)
(212)-332-8821 (fax)

Mark Joseph Weber, Esq.
Mound Cotton Wollan & Greengrass (NYC)
One Battery Park Plaza
New York, NY 10004
(212) 804-4296 (phone)
(212) 344-8066 (fax)

Todd E. Weisman, Esq.
Eschen, Frenkel & Weisman, LLP
20 West Main Street
Bay Shore, NY 11706
(631)-969-7777 (phone)
(631)-206-0540 (fax)

Keara M. Gordon, Esq.
Michael D. Hynes, Esq.
DLA Piper Rudnick Gray Cary US LLP
1251 Avenue of the Americas
New York, NY 10020
(212)-335-4942 (phone - Hynes)
(212)-335-4632 (phone - Gordon)
(212)-884-8642 (fax)

James E. Tyrrell, Jr., Esq.
Patton Boggs LLP
One Riverfront Plaza, 6th Floor
Newark, NJ 07102-5401
(973) 848-5680 (phone)
(973) 848-5601 (fax)

Tracey Lyn Jarzombek, Esq.
White & McSpedon, P.C.
875 Avenue of the Americas, Suite 800
New York, NY 10001
(212) 564-6633 (phone)
(212) 564-9799 (fax)

TO:

Marla DiResta, Esq.
Andrew Gibbs, Esq.
Cozen O'Connor
45 Broadway, 16th Floor
New York, NY 10006
(212) 908-1273 (phone)
(212) 509-9492 (fax)

Sheetal Kale, Esq.
Vincent Nagler, Esq.
Matthew Koster, Esq.
Callan, Koster, Brady & Brennan, LLP
One Whitehall Street
New York, NY 10004
(212) 248-2800 (phone)
(212) 248-6815 (fax)

Daniel S. Corde, Esq.
Jones Hirsch Connors & Bull P.C.
One Battery Park Plaza
New York, NY 10004
(212) 527-1370 (phone)
(212) 527-1680 (fax)

Frank J. Keenan, Esq.
Methfessel & Werbel
450 Seventh Avenue
New York, NY 10123
(212) 947-1999 (phone)

Marguerite M. Sullivan, Esq.
Peter Winik, Esq.
Kristi O'Malley, Esq.
Latham & Watkins LLP
555 Eleventh Street, NW, Suite 1100
Washington, DC 20004-1304
(202) 637-2200 (phone)
(202) 637-2201 (fax)

- and -

TO:

Peter Rosen, Esq.
Latham & Watkins LLP
633 West Fifth St., Suite 4000
Los Angeles, CA 90071-2007
(213) 891-8778 (phone)
(213) 891-8763 (fax)

Arlene Gharabeigie, Esq.
Christian Holt Gannon, Esq.
Segal, McCambridge, Singer & Mahoney, Ltd.
830 Third Avenue, Suite 400
New York, NY 10022
(212) 651-7500 x7417 (phone)
(212) 651-7499 (fax)

Malcolm A. Goldstein, Esq.
Koehler & Isaacs, LLP
61 Broadway, 25th Floor
New York, NY 10006
(917) 551-1330 (phone)
(212) 791-4115 (fax)

Roger B. Lawrence, Esq.
Lawrence, Worden & Rainis, P.C.
425 Broad Hollow Road, Suite 120
Melville, New York 11747
(631) 694-0033 (phone)
(631) 694-9331 (fax)

Steven J. Harfenist, Esq.
Heather L. Smar, Esq.
Friedman, Harfenist, Langer & Kraut, LLP
3000 Marcus Avenue, Suite 2E1
Lake Success, New York 11042
(516) 775-5800 (phone)
(516) 775-4082 (fax)

Mitchell L. Pascual, Esq.
Scarinci & Hollenbeck, LLC
1100 Valley Brook Avenue
Lyndhurst, NJ 07071-0790
(201) 896-4100 (phone)
(201) 896-8660 (fax)

TO:

John Dellaportas, Esq.
Brian Damiano, Esq.
Duane Morris LLP
380 Lexington Avenue
New York, NY 10168
(212) 692-1012 (phone)
(212) 692-1020 (fax)

Neal Schwarzfeld, Esq.
Penn Proefriedt Schwarzfeld & Schwartz
114 West 47th Street, 19th Floor
New York, NY 10036
(212) 354-7700 (phone)
(212) 997-5070 (fax)

Daniel Graber, Esq.
Sullivan, Chester, & Gardner, P.C.
475 Park Avenue So., 30th Floor
New York, NY 10016
(212) 687-5900 (phone)
(212) 687-4060 (fax)

Veronica Maginnis, Esq.
Justin E. Klein, Esq.
Satterlee Stephens Burke & Burke LLP
230 Park Avenue, Suite 1130
New York, NY 10169
(212) 818-9200 (phone)
(212) 818-9606 (fax)

John P. Cookson, Esq.
Brian Keatts, Esq.
Greg Trif, Esq.
John Dwyer, Esq.
Richard Mills, Esq.
McElroy, Deutsch, Mulvaney & Carpenter, LLP
Wall Street Plaza
88 Pine Street, 24th Floor
New York, NY 10005
(212) 483-9490 (phone)
(212) 483-9129 (fax)

TO:

Jacob Buczko, Esq.
Kaye Scholer LLP
425 Park Avenue
New York, NY 10022
(212) 836-7798 (phone)
(212) 836-6344 (fax)

Charles Rysavy, Esq.
McCarter & English
4 Gateway Center
100 Mulberry Street
Newark, NJ 07102
(973) 622-4444 (phone)
(973) 297-3730 (fax)

Brian Moran, Esq.
Paul Hastings Janufsky & Walker LLP
Park Avenue Tower
75 E. 55th Street, First Floor
New York, NY 10022
(212) 318-6857 (phone)
(212) 230-5152 (fax)

Patrick D. Geraghty, Esq.
Wilson, Elser Moskowitz Edelman & Dicker LLP
150 East 42nd Street
New York, NY 10017-5639
(212) 490-3000 (phone)
(212) 490-3038 (fax)

Peter W. Wies, Esq.
Assistant Chief, WTC Unit
Corporation Counsel – City of New York
100 Church Street, Rm. 20-1105
New York, NY 10007
(212) 788-1409 (phone)
(212) 788-0367 (fax)

TO:

Stanley Goos, Esq.
Brian Bender, Esq.
Steven Rice, Esq.
Harris Beach PLLC
805 Third Avenue
New York, NY 10022
(212) 687-0100 (main)
(212) 313-5452 (direct)
(212) 687-0659 (fax)

Robyn Gellert, Esq.
Wilson, Elser, Moskowitz, Edelman & Dicker LLP
150 East 42nd Street
New York, NY 10017-5639
(212) 490-3000 (phone)
(212) 490-3038 (fax)

Edward Grosz, Esq.
Norris Wolff, Esq.
Kleinberg, Kaplan, Wolff & Cohen, P.C.
551 Fifth Avenue
New York, NY 10176
(212) 986-6000 (phone)
(212) 986-8866 (fax)